



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ENVIRONMENTAL
CLEANUP

JUL - 5 2011

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. James L. Groh
Branch Manager
JCI Jones Chemicals Inc.
1919 Marine View Drive
Tacoma, Washington 98422

Re: Inspection of Risk Management Program (RMP)
EPA RMP Facility ID# 1000 0007 8845

Dear Mr. Groh:

The U.S. Environmental Protection Agency will be inspecting the JCI Jones Chemicals Inc. facility located at 1919 Marine View Drive, Tacoma on July 13, 2011. This inspection will look specifically at compliance with Section 112(r) of the Clean Air Act, also known as the Risk Management Program. The RMP inspection is conducted pursuant to the authorities under Section 112(r) and Section 114 of the Clean Air Act. In accordance with CAA Section 112(r)(6)(L), facility employees and employee representatives (such as a union representative) have the same rights to participate in the RMP inspections of any workplace conducted pursuant to CAA Section 112(r).

In observance of the CAA requirement cited above, Occupational Safety and Health Act (29 C.F.R. 1903.8) requires sharing information:

- A copy of this letter must be provided to the employee representative(s) (identified per above).
- Post this letter, upon receipt, accessible to employees in the facility.

The inspection team (consisting of Bob Hales, Stephanie Allen, Charles Wilson and James Petersen) plans to arrive at the facility around 8:30 AM and complete our work around 12:00 PM. We will need assistance from employees who are responsible or familiar with the Risk Management Program during this time. The schedule we generally follow is as follows:

- 1) Introduction and brief review of purpose of visit (EPA)
- 2) Brief explanation of facility operations (Facility)
- 3) Safety briefing for EPA personnel and tour of facility, concentrating on RMP-covered process (led by Facility)
- 4) Review of Risk Management Program documents (EPA)
- 5) Close-out discussion (EPA & Facility)

Please be advised that we take photos during our tour of the covered process, in addition to inspecting equipment and processes of concern. The following documents should be made available during the time of our inspection:

- 1) A copy of the most recent RMP
- 2) Hazard Assessment (Worst Case and Alternative Release scenarios)
- 3) RMP Prevention Program documentation including:

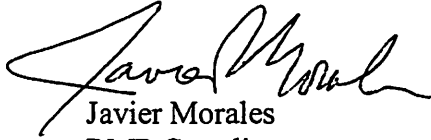
RMP PROGRAM 3 PREVENTION PROGRAM		OSHA PSM REFERENCE
§ 68.65	Process Safety Information	PSM standard § 1910.119(d)
§ 68.67	Process Hazard Analysis (PHA)	PSM standard § 1910.119(e)
§ 68.69	Operating Procedures	PSM standard § 1910.119(f)
§ 68.71	Training	PSM standard § 1910.119(g)
§ 68.73	Mechanical Integrity	PSM standard § 1910.119(j)
§ 68.75	Management of Change	PSM standard § 1910.119(l)
§ 68.77	Pre-Startup Review	PSM standard § 1910.119(I)
§ 68.79	Compliance Audits	PSM standard § 1910.119(o)
§ 68.81	Incident Investigation	PSM standard § 1910.119(m)
§ 68.83	Employee Participation	PSM standard § 1910.119(c)
§ 68.85	Hot Work Permit	PSM standard § 1910.119(k)
§ 68.87	Contractors	PSM standard § 1910.119(h)

- 4) Emergency Response Plan or Emergency Action Plan

Inspection Preparation: The Region 10 Risk Management Program website has many resources that will help you prepare for EPA inspections. You can download copies of the *RMP Program Level 3 Process Checklist*, review the RMP regulation, industry sector guidance and informative articles in the RMP Newsletter. The US EPA Region 10 Risk Management Program website is at:
<http://yosemite.epa.gov/R10/airpage.nsf/Enforcement/rmp>.

We appreciate your cooperation, and particularly your efforts to gather the required documents beforehand. Having the materials readily available will greatly speed up our inspection. If you have any questions, please feel free to contact me at (206) 553-1255.

Sincerely,

A handwritten signature in black ink, appearing to read "Javier Morales", written in a cursive style.

Javier Morales
RMP Coordinator
Emergency Preparedness and Prevention Unit
Emergency Management Program

Enclosure: Office of Enforcement and Compliance Assurance Information Sheet, U.S. EPA Small Business Resources, EPA 300-F-07-003, Oct. 2007